

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

Case No. 1:20-cv-00683,  
*Fields v. Prinston Pharmaceutical Inc., et. al.*

**AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF**  
**PLAINTIFF TIVIS FIELDS**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Prinston Pharmaceutical Inc. will take the deposition upon oral examination of Tivis Fields, on **October 21-22, 2021, at 10:00 a.m. EDT** each day, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Raymond Vanderhyden  
30 South 17th Street  
Philadelphia, PA 19103-4196  
Tel: 215- 979-1865  
Fax: 215-689-0880  
[ravanderhyden@duanemorris.com](mailto:ravanderhyden@duanemorris.com)

September 22, 2021

Respectfully submitted,

**DUANE MORRIS LLP**

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*Attorney for Zhejiang Huahai  
Pharmaceutical Co., Ltd., Solco  
Healthcare U.S., LLC, and Princeton  
Pharmaceutical Inc.*

**CERTIFICATE OF SERVICE**

I certify that on September 22, 2021 a true and correct copy of the foregoing Amended Notice of Videotaped Deposition of Plaintiff Tivis Fields was served upon all counsel of record via CM/ECF. I further certify that a copy of the foregoing was served on the following counsel by email on September 22, 2021:

Sejal Brahmbhatt (counsel for Plaintiff Fields)

Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)

Daniel A. Nigh, Esq. (via email)

Ruben Honik, Esq. (via email)

David Stanoch, Esq. (via email)

Conlee Whiteley, Esq. (via email)

Seth A. Goldberg, Esq. (via email)

Jessica Priselac, Esq. (via email)

Clem C. Trischler, Esq. (via email)

Sarah E. Johnston, Esq. (via email)

*/s/ Raymond Vanderhyden* \_\_\_\_\_  
Raymond Vanderhyden